

SHANNON L. GUSTAFSON (SBN 228856)
sgustafson@lynberg.com
EDWARD J. SOUTHCOTT, JR. (SBN 305701)
esouthcott@lynberg.com

LYNBERG & WATKINS

A Professional Corporation
1100 W. Town & Country Road, Suite 1450
Orange, California 92868
(714) 937-1010 Telephone
(714) 937-1003 Facsimile

Attorneys for Defendants COUNTY OF SAN BERNARDINO
and SHERIFF SHANNON D. DICUS

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

COLLEEN MANGHANE; and
ROBERT MANGHANE

Plaintiffs,

vs.

COUNTY OF SAN BERNARDINO;
SHANNON DICUS; DESERT
VALLEY HOSPITAL; and DOES 1-
15, inclusive.

Defendants.

Case No. 5:25-cv-01107-JGB (DTBx)

*Assigned for All Purposes to
Honorable Jesus G. Bernal*

Magistrate Judge: David T. Bristow

**COUNTY DEFENDANTS' NOTICE
OF RELATED CASES**

Complaint Filed: 5/7/2025

Trial Date: None Set

///

///

///

///

///

///

///

///

///

TO THE HONORABLE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to Central District Local Rule 83-1.3, Defendants COUNTY OF SAN BERNARDINO and SHERIFF SHANNON D. DICUS (“Defendants”) are obligated to give notice to the Court that the matter entitled *Arthur James, et al. v. County of San Bernardino, et al.* Case No. 5:25-cv-00140 WLH-SHK in the Central District of California (hereinafter “*James*”) is a related case.

The *James* action was filed in the Central District of California on January 17, 2025 by Decedent Aaron James’s biological parents, Arthur James and Stacey M. Abbott. Specifically, in the declaration filed by Decedent’s biological parents (Dkt. 15-16), they exercised their right setting forth “[n]o other person has a superior right to commence the above-entitled proceeding or to be substituted for Aaron James in the above-entitled proceeding.” (¶ 6). That matter asserted claims arising out of the same event that are the basis of the current action entitled *Colleen Manghane, et al. v. County of San Bernardino, et al.* Case No. 55:25-cv-01107-JGB (DTBx) (hereinafter “*Manghane*”) brought by the foster parents of Decedent. Specifically, both *James* and *Manghane* seek to hold Defendants liable for the death of Aaron James that occurred on April 2, 2024 at or around the 17100 block of Forest Hills Dr., Victorville, County San Bernardino, California. Further the Plaintiffs in both this action and the related *James* matter contend that they are the proper successors in interest and representative of Decedent as a result of his death on April 2, 2024.

Specifically, after the Second Amended Complaint was filed in the *James* action, the Manghane Plaintiffs filed this action, which has the same or substantially related or similar question of law and fact. Further the County of San Bernardino, Sheriff Dicus and Desert Valley Hospital are named as Defendants in both actions.

Accordingly, the two actions are related under Central District Local Rules 83-1.3.1 subdivision (a) as they “arise from the same or a closely related transaction,

1 happening, or event,” that is, both pleadings allege constitutional violations and
2 related state law claims by the same party the Estate of Aaron James against the same
3 Defendants for the same events that transpired on April 2, 2024.. Further 83-1.3.1
4 subdivision (b) provides that a Notice of Related Cases be filed if the two cases call
5 for determination of the same or substantially related or similar questions of fact and
6 law.

7 Finally, as a result of the allegations in the *James* matter and the case at bar,
8 this Court may be required to engage in “substantial duplication of labor if heard by
9 different judges.” Local Rule 83-1.3.1(c).

10 Therefore, Defendants request that this *Manghane* matter be deemed “related”
11 to *James* pursuant to *Local Rule* 83-1.3.1 and transferred to be heard by the same
12 judge.

13 DATED: June 17, 2025

LYNBERG & WATKINS
A Professional Corporation

15 By: /s/ Shannon L. Gustafson
16 **SHANNON L. GUSTAFSON**
17 **EDWARD J. SOUTHCOTT, JR.**
18 Attorneys for Defendants
COUNTY OF SAN BERNARDINO and
SHERIFF SHANNON D. DICUS